

JOEL A. ACKERMAN
JA 4027

XCA-171319-1/dmo
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Secured Creditor,
Wells Fargo Bank, NA
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	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
IN RE:	:	
	:	CHAPTER 13
Ronald Boatright	:	
Debtor	:	CASE NO. 12-30246-GMB
	:	
	:	NOTICE OF OBJECTION
	:	(CONFIRMATION HEARING DATE:
	:	October 17, 2012 @ 9:00am)

The undersigned, ZUCKER, GOLDBERG & ACKERMAN, LLC, attorneys for Secured Creditor Wells Fargo Bank, NA , the holder of a Mortgage on the debtor's premises at 12 McCay Way, Delanco, NJ 08075 hereby objects to the confirmation of the debtor's proposed Chapter 13 Plan in the event the debtor fails to make the regular monthly mortgage payments to the Secured Creditor, outside of the Chapter 13 Plan, in accordance with the provisions of said Plan, in violation of 11 U.S.C. 1326.

Furthermore, the Secured Creditor objects to any provision in the debtor's plan which provides for an amount less than the amount due the Secured Creditor as set forth in its Proof of Claim.

In the event the debtor cures the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and the aforesaid objection should be deemed waived.

ZUCKER, GOLDBERG & ACKERMAN, LLC
ATTORNEYS FOR SECURED CREDITOR
/s/ JOEL A. ACKERMAN
JOEL A. ACKERMAN
MEMBER OF THE FIRM

DATED: August 21, 2012

This is an attempt to collect a debt. Any information obtained will be used for that purpose.